

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

IN RE: REQUEST FOR JUDICIAL
ASSISTANCE FROM THE NATIONAL
EMPLOYMENT COURT NO. 46
IN BUENOS AIRES, ARGENTINA
IN THE MATTER OF LECLIA
SCARPELLI V. GRAND CIRCLE
ARGENTINA S.R.L., ET AL.

CASE NO. 1:22-mc-91552

/

COMMISSIONER'S SUBPOENA

To: Vantage Travel
90 Canal Street
Boston, MA 02114-2031

I, Katerina Ossenova, a Senior Trial Counsel for the U.S. Department of Justice, Civil Division, Office of Foreign Litigation, Office of International Judicial Assistance, acting under the authority of Title 28, United States Code, Section 1782, for the purpose of rendering assistance to Argentina, command that you provide to me evidence for use in a civil lawsuit in the National Employment Court No. 46 in Buenos Aires, Argentina, entitled *Lucelia Scarpelli v. Grand Circle Argentina S.R.L., et al.*, Foreign Reference Number 695/2022, said evidence being:

To provide the completed affidavit – signed and notarized – in response to the Argentine Court's two interrogatories (see Attachment A) by email to me at Katerina.V.Ossenova@usdoj.gov or by mail at the address set forth below no later than _____ (date).

Katerina V. Ossenova
Senior Trial Counsel
U.S. Department of Justice, Civil Division
Office of Foreign Litigation
Office of International Judicial Assistance
1100 L Street, NW, Room 8102
Washington, D.C. 20530

For failure to provide said evidence, you may be deemed guilty of contempt and liable to penalties under the law. The recipient of the attached subpoena may, for good cause shown, oppose the giving of evidence, or the circumstances thereof, by motion timely filed with the Court.

If you have any questions regarding the contents of this request or the methods by which you may comply with the subpoena, please contact me by phone at (202) 353-0194 or by email at Katerina.V.Ossenova@usdoj.gov.

Dated this _____ day of _____, 2022.

KATERINA OSSENOVA, Commissioner
Senior Trial Counsel
U.S. Department of Justice, Civil Division
Office of Foreign Litigation
Office of International Judicial Assistance
1100 L Street, NW
Room 8102
Washington, DC 20530
Phone: 202-353-0194
Email: Katerina.V.Ossenova@usdoj.gov

ATTACHMENT A

U.S. DEPARTMENT OF JUSTICE
OFFICE OF INTERNATIONAL JUDICIAL
ASSISTANCE

-----X
IN RE: :
: :
LETTER OF REQUEST FROM THE : Ref No.: 695/2022
NATIONAL EMPLOYMENT COURT NO.:
46 IN BUENOS AIRES, ARGENTINA IN : DJ No. 189-44-22-79
THE MATTER OF LUCELLA :
SCARPELLI V. GRAND CIRCLE :
ARGENTINA S.R.L. ET AL. :
-----X

EXECUTION AFFIDAVIT OF LETTER OF REQUEST

I, _____, a citizen of _____ (country),
born on _____, in _____ (city, state or
country), presently residing at _____ (address), on
behalf of Vantage Travel, state under oath:

I have been furnished by the U.S. Department of Justice, Office of International Judicial Assistance, with a copy of the above captioned Letter of Request, issued pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, requesting that I answer written interrogatories relating to a civil case captioned Lucelia Scarpelli v. Grande Circle Argentina S.R.L, et al. and pending before the National Employment Court No. 46 in Buenos Aires, Argentina.

The following are my responses to the questions contained in the Letter of Request. These responses are based upon personal knowledge.

INTERROGATORIES to Vantage Travel

INTERROGATORY 1: Whether Vantage Travel maintained any kind of employment relationship with Ms. Lucelia Scarpelli, Argentine Identity Document No. 30.035.597?

ANSWER:

If so, please indicate:

- i. Whether she was under an employment relationship with Vantage Travel?

ANSWER:

If yes:

- a. The employment start and end dates?

ANSWER:

- b. The type of contract (fixed-term, seasonal, temporary)?

ANSWER:

- c. The days she worked

ANSWER:

- ii. Whether she provided services as an independent contractor?

ANSWER:

- a. Since when she provided the services, particularly if she rendered them from September 2008 through December 2017?

ANSWER:

- b. A description of the services?

ANSWER:

c. The services start and end dates?

ANSWER:

INTERROGATORY 2: If none of the above occurred, please state the nature and extent of the relationship with Ms. Scarpelli?

ANSWER:

The foregoing answers are true and correct to the best of my knowledge and belief.

Dated: _____, _____ (City, State)

_____, _____ (Date)

Signature

Print Name